

Exhibit “X”

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re:

HOFFMANS TRADE GROUP LLC,
Debtor

Chapter 7
Case No. 13-11662-REL

MARC S. EHRLICH, AS TRUSTEE FOR
HOFFMANS TRADE GROUP LLC,

Plaintiff

Adv. Pro. No.15-90038

v.

MCLANE GLOBAL, JORDAN LACETTI,
and MICHAEL COAKLEY

Defendants.

DECLARATION IN SUPPORT OF TRUSTEE'S
RESPONSE TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT
PURSUANT TO BANKRUPTCY RULE 7056

Plaintiff, Marc Ehrlich, as Trustee for Hoffmans Trade Group LLC ("Trustee"), by and through his counsel, Deily & Glastetter, LLP, submits this Affidavit in response to Defendant's McLane Global ("McLane"), Jordan Lacetti ("Lacetti") and Michael Coakley ("Coakley") (collectively the "Defendants") Motion for Summary Judgment Pursuant to Bankruptcy Rule 7056 against Plaintiff, Chapter 7 Trustee, Marc S. Ehrlich,

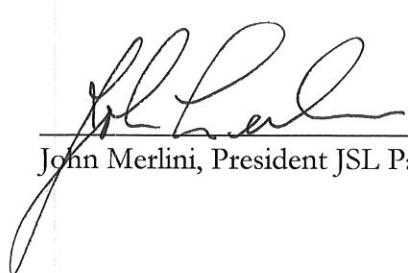
John Merlini, being duly sworn deposes as follows:

1. I am John Merlini, President of JSL Partners, Inc. (Hereinafter "JSL") with business offices located at 2600 E. Market St. Greensboro, NC 27401.
2. JSL engages in, among other things, the sale of consumer products similar to that of the debtor and McLane Global. Specifically, JSL engages in the sale of consumer products

to food banks. JSL is a credit of this debtor. JSL is and was a competitor of the debtor and McLane Global. JSL was also the successful bidder for the Trustee's sale of another customer list for the waste recycling business of the debtor, sold under Court order dated March 12, 2015.

3. I have reviewed the Motion for Summary Judgment and supporting affidavits submitted by McLane Global.
4. I submit this affidavit because I believe the self-serving assertions in the McLane Global affidavits are false. As a competitor in this industry, I assure the Court there is value in the customer list for the debtor. I independently contacted the Trustee about acquiring the customer list belonging to this debtor.
5. The contact numbers and names of the persons in the food bank industry are not all publically available on the internet nor is that information kept current on the internet. Like McLane Global, I have been attempting to grow the food bank portion of JSL for the last several years. I know there to be value in the list of customer and contact information once held only by this debtor.

Dated: September 27, 2016


John Merlini, President JSL Partners Inc.

Bernice M. McKenna
Notary Public
Bernice M. McKenna

State of NC County of GUILFORD
Subscribed and sworn to (or affirmed) before me on this
27th day of September, 2016 by
John Merlini proved to me on the basis
of satisfactory evidence to be the person(s) who appeared before me.
Notary Signature Bernice M. McKenna
Bernice M. McKenna

Commission

Expires - 09-02-2018